



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 27, 2023

BY ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Perez et al.*, 23-99 (LJL)

Dear Judge Liman,

The Government respectfully submits this letter to seek, with the consent of the defendants, a 30-day adjournment of the status conference currently set for May 1, 2023 at 2p.m.

The Government is ready to make its first discovery production, but due to size, it has asked defense counsel for hard drives first. Given that the defense will need time to review the discovery, all parties agree that an adjournment of the currently scheduled conference for 30 days would make sense.

For the same reason, the Government also moves, with the defendants' consent, to exclude time under the Speedy Trial Act between May 1, 2023 and the next-scheduled status conference. Such an exclusion is in the interest of justice because it will allow the defendants to review the discovery and to engage in any discussions with the Government regarding a pretrial disposition.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/
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